

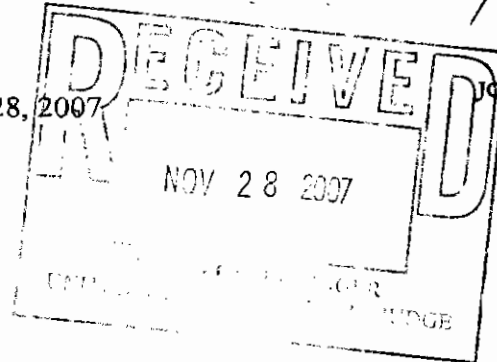
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**VIA FACSIMILE**

United States District Court  
Southern District of New York  
500 Pearl Street, Room 1310  
New York, New York 10007  
Attn.: Michael H. Dolinger, U.S.M.J.

November 28, 2007



Re: Zhao v. City of New York et al.  
07CV.3636 (LAK)(MHD)

Dear Honorable Judge Dolinger:

We are writing to respectfully request an immediate conference regarding discovery in the above-referenced matter pursuant to Your Honor's chamber rules and Local Rule 37.2.

On October 19, 2007, plaintiff served defendants Requests for Admission and Third Set of Interrogatories and Request for Production of Documents. On November 21, 2007, plaintiff received defendants responses to said requests, which are attached hereto and contain both the requests and responses, objecting and refusing to answer each and every Request to Admit, as well as the Interrogatories and Requests to Produce, providing in partial response a single, improperly redacted Purchase Order, a copy of which is also attached hereto.

Since the date of said responses, counsel for plaintiff and defendants have exchanged correspondence and had telephone conversations regarding the propriety of plaintiff's requests and defendants' responses thereto, especially with regard to the Requests to Admit. The parties cannot amicably resolve these disputes absent judicial intervention. Therefore, we respectfully request a pre-motion conference prior to moving for an order to compel.

Respectfully submitted,

SIEGLE & SIMS L.L.P.

Eric W. Siegle

cc: John H. Graziadei, A.C.C. (via facsimile)

*Handwritten notes:*  
END: 2:00 PM  
11/28/07  
A pre-motion conference is needed.  
Plaintiff may file a motion seeking  
appropriate relief. This is to be done  
by no later than Dec. 5, 2007.  
11/28/07